

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY  
Richard J. Hughes Justice Complex  
25 Market Street  
P.O. Box 093  
Trenton, N.J. 08625-0093  
Attorney for Plaintiffs

By: Andrew P. Verdone  
Deputy Attorney General  
Attorney ID No. 306352019  
andrew.verdone@law.njoag.gov  
(609) 376-2740

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CUMBERLAND COUNTY  
DOCKET NO.

NEW JERSEY, DEPARTMENT OF	:	
ENVIRONMENTAL PROTECTION and	:	
SHAWN LATOURETTE, ACTING	:	
COMMISSIONER OF NEW JERSEY	:	<u>Civil Action</u>
DEPARTMENT OF ENVIRONMENTAL	:	
PROTECTION,	:	COMPLAINT
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
THOMAS DAILEY; 330 ANGLE	:	
SEA, LLC; XYZ CORPORATIONS	:	
1-10; AND JOHN AND/OR JANE	:	
DOES 1-10,	:	
	:	
Defendants.	:	

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Plaintiffs, New Jersey Department of Environmental Protection  
("DEP") and Shawn LaTourette, Acting Commissioner of the New Jersey  
Department of Environmental Protection ("Commissioner")  
(collectively, "Department"), having their principal offices at

401 East State Street in the City of Trenton, County of Mercer, State of New Jersey, by and through their attorney, file this Complaint against Defendants Thomas Dailey, 330 Angle Sea, LLC ("330 Angle Sea"), XYZ Corporations 1-10 (Names Fictitious) and John and/or Jane Does 1-10 (Names Fictitious) (collectively, "Defendants"), and allege as follows:

**STATEMENT OF THE CASE**

1. This is a civil action under the Underground Storage of Hazardous Substances Act, N.J.S.A. 58:10A-21 to -35 ("UST Act") to require Defendants to properly remove and close an out-of-service gasoline Underground Storage Tank ("UST") on their property, to hold them responsible for the improper removal and closure of two USTs, and to compel them to investigate and remediate any contamination at or from the property.

2. In 1992, Defendant Thomas Dailey purchased from Alfred A. Gratz property located at 885 N. Pearl Street in Bridgeton, New Jersey ("Site"). The Site operated previously as a car dealership and contained at least three USTs at the time Dailey purchased the Site. Dailey later transferred ownership of the Site to his limited liability company, 330 Angle Sea. Dailey is the sole member of 330 Angle Sea.

3. Shortly after Dailey purchased the Site, on approximately July 7, 1992, DEP received an anonymous report that

two on-site USTs containing petroleum products had been removed. At that time, DEP did not follow-up on the anonymous report.

4. The significance of the anonymous report became clear later when the former owner of the Site, Alfred A. Gratz disclosed in his response to a UST Facility Certification Questionnaire in 2013 ("2013 Questionnaire") that three USTs were located on the site in 1992 when Dailey purchased the property.

5. As the owner and operator of the Site and the USTs in 1992, Dailey had an obligation to close the USTs in compliance with applicable regulations, which included registering the USTs, reporting the USTs' removal to DEP, and conducting a site investigation following the USTs removal. Dailey failed to satisfy any of these requirements.

6. DEP's Site Remediation Program inspected the Site in 2015 to determine the presence of any remaining USTs ("December 2015 Inspection"). DEP identified only one remaining out-of-service UST on the Site at this time. This UST was filled with a mixture of water and petroleum product that gave off an odor of gasoline. DEP concluded that there had likely been a release from the UST and directed Dailey, who was still the owner of the Site, to hire a Licensed Site Remediation Professional ("LSRP") to remove the remaining UST and begin remedial activities. Again, he failed to comply.

7. Failure to investigate possible releases of harmful substances and adhere to the regulatory requirements for proper closure and removal of USTs poses a risk that leaks of dangerous contaminants will go undetected and unremediated.

8. Gasoline and its components pose threats to the environment and public health when they enter the soil and groundwater because they persist in soil for long periods of time, threatening plant and animal life and human health when ingested or inhaled. Ingesting gasoline or inhaling gasoline vapors can cause dizziness, headaches, lung irritation, and nervous system disruptions.

9. The community surrounding the Site has a significant low-income and minority population. Historically, across New Jersey, such communities have been disproportionately exposed to high-polluting facilities and the resultant threats of high levels of air, water, and soil pollution, and accompanying potential for increased adverse public health impacts.

10. Residents of all communities should receive fair and equitable treatment in matters affecting their environment, community, homes, and health without regard to a community's socio-economic condition. See, e.g., Exec. Order No. 23 (April 20, 2018), 50 N.J.R. 1241(b) (May 21, 2018), and Environmental Justice Law, N.J.S.A. 13:1D-157 to -161.

11. Dailey and/or his recently formed limited liability company, 330 Angle Sea, failed to: i. properly close the two petroleum product USTs in 1992 by registering the tanks, notifying DEP of their intent to remove the USTs, and conducting a post-UST removal site investigation; ii. properly close the remaining UST by registering the UST, notifying DEP of their intent to remove the UST, and conducting a post-UST removal site investigation; and iii. investigate possible harm to public health and the environment caused by the UST identified during the December 2015 Inspection. These failures pose a continuing threat to the health of the community and the environment.

12. The Department now seeks to compel Defendants: (1) to conduct site investigations to determine the existence of hazardous substances in the soil and groundwater at the Site and the land and groundwater of surrounding properties that may have been contaminated with hazardous substances discharged at the Site; (2) to close the UST at the Site in compliance with the relevant environmental laws and regulations; and (3) to pay civil statutory penalties for their misconduct.

#### **PARTIES**

13. DEP is a principal department in the State of New Jersey's executive branch of government. DEP maintains its principal offices at 401 East State Street, Trenton, Mercer County, New Jersey.

14. The Commissioner maintains his principal office at 401 East State Street, Trenton, Mercer County, New Jersey. The Commissioner is authorized by law to commence a civil action in Superior Court for appropriate relief for any violation of the UST Act. N.J.S.A. 58:10A-32; N.J.S.A. 58:10A-10.c.

15. Defendant Thomas Dailey is an individual with a principal address located at 330 Angle Sea Drive, North Wildwood, NJ 08260. Dailey owned the Site from 1992 until 2017.

16. Defendant 330 Angle Sea is a limited liability company organized under the laws of the State of New Jersey with a principal place of business at 461 N. Pearl Street, Bridgeton City, NJ 08302. Dailey transferred ownership of the Site to 330 Angle Sea in 2017. 330 Angle Sea is the current owner of the Site. Defendant Thomas Dailey is the sole member of 330 Angle Sea.

17. Defendant "John Does" and/or "Jane Does" 1 through 10, these names being fictitious, are individuals, including but not limited to, responsible corporate officials, who discharged, are in any way responsible for, and/or contributed to the discharge of hazardous substances and pollutants at the Property with identities that cannot be ascertained or confirmed as of the filing of this Complaint.

18. Defendants "XYZ Corporations" 1 through 5, these names being fictitious, are entities that discharged, are in any way responsible for, and/or contributed to the discharges of hazardous

substances at the Property, with identities that cannot be ascertained or confirmed as of the filing of this Complaint, certain of which are corporate successors to, predecessors of, tenants of, or are otherwise related to the named defendants.

#### **GENERAL ALLEGATIONS**

19. The Site is known as Block 3, Lot 2 on the Bridgeton tax map and Block 1902, Lot 9 on the Upper Deerfield Township tax map and is known to the DEP as Program Interest Number 003631.

20. The Site has historically been the location of "more than one underground storage tank (UST) systems," as defined by N.J.A.C. 7:14B-1.6. Use of the USTs at the Site ceased in approximately 1987. One UST remains at the Site currently and two USTs were removed in 1992.

21. Gasoline and its components pose threats to the environment and public health when they enter the soil and groundwater. Gasoline persists in soil for long periods of time, impeding plant growth and threatening birds and mammals with irritation and toxicity. Gasoline also poses a threat to human health, as ingesting gasoline or inhaling gasoline vapors can cause dizziness, headaches, lung irritation and nervous system disruptions. See, e.g., Agency for Toxic Substances and Disease Registry, Public Health Statement for Automotive Gasoline, CENTER FOR DISEASE CONTROL (June 1995), <https://www.atsdr.cdc.gov/phs/phs.asp?id=466&tid=83>.

22. Dailey purchased the Site on approximately March 20, 1992.

23. On approximately July 7, 1992, DEP received an anonymous report to its hotline that two of the USTs at the Site had been removed from the Site. The USTs were never registered as required by law at the time, and DEP was never notified of the removal. This removal of the two USTs occurred without DEP knowledge or oversight.

24. Upon information and belief, on approximately July 7, 1992, Dailey removed two USTs ("UST 1" and "UST 2") without implementing a closure plan consisting of a site investigation as required by N.J.A.C. 7:26E-3.3, and a tank decommissioning plan as required by N.J.A.C. 7:14B-9.2(b).

25. On approximately September 10, 2013, former Site owner Alfred A. Gratz completed the 2013 Questionnaire listing Dailey as the owner and operator of three USTs on the Site as of the purchase of the Site in July 1992. DEP sent a Notice of Deficiency to Dailey on approximately September 13, 2013, requesting an update to the tank information and the payment of fees.

26. DEP conducted an inspection of the Site on December 8, 2015, and observed one out-of-service UST onsite ("UST 3"). The two other USTs, UST 1 and UST 2, identified in the 2013 Questionnaire, were not identified or located during the inspection.

27. The inspection identified an UST fill port visible on the Site at ground level. The UST fill port was opened and, upon inspection, DEP officials smelled the odor of gasoline. DEP determined using a tank stick that UST 3 contained water mixed with a petroleum liquid with the odor of gasoline. DEP concluded that the amount of water in the tank was likely not solely attributable to condensation or deliveries, but instead likely due to a leak in the UST. The presence of water in the UST qualified as a "suspected release."

28. On December 8, 2015, after their inspection, DEP officials advised Dailey in person that he must hire a Licensed Site Remediation Professional ("LSRP") to investigate the Site and close the UST. Dailey did not hire an LSRP as advised.

29. On May 18, 2017, Dailey sold the Site to 330 Angle Sea, LLC for a nominal fee of one dollar.

30. 330 Angle Sea's sole listed member is Thomas Dailey.

31. Upon information and belief, 330 Angle Sea is a legal entity through which Dailey conducts business activities with regard to the Site.

32. Neither Defendant has retained a LSRP, conducted any site investigations, or otherwise acted to resolve the past and ongoing violations of the three USTs at the Site.

33. Defendants' failure to hire a LSRP, investigate UST 1 and 2 that were removed in 1992, register and close the out-of-

service UST 3, conduct the required site investigations and any necessary remediation, or otherwise resolve the past and ongoing violations of the UST Act at the Site, poses an ongoing danger to public health and environment.

**Count I**

**Defendant Dailey's Violation of the Underground Storage of  
Hazardous Substances Act for USTs 1 & 2**

34. The Department repeats each allegation of the preceding paragraphs above as though set forth in their entirety herein.

35. An "owner and operator who intends to close an [UST] containing hazardous substances . . . shall implement a closure plan which consists of a site investigation set forth at N.J.A.C. 7:26E-3.3 and a tank decommissioning plan . . . ." N.J.A.C. 7:14B-9.2.

36. "'Close' or 'closure' means the permanent elimination from service of any [UST] system by removal or abandonment in place." N.J.A.C. 7:14B-1.6.

37. An "'[o]wner' means any person who owns a facility, or any person who has a legal or equitable title to a site containing a facility and has exercised control of the facility." N.J.A.C. 7:14B-1.6.

38. An "'[o]perator' means each person who leases, operates, controls, supervises, or has responsibility for, the daily

operation of a facility, and each person who has the authority to operate, control, or supervise the daily operation of a facility.”

39. Defendant Thomas Dailey was the owner and operator of the petroleum product USTs on the Site from July 1992 until at least May 2017.

40. Upon information and belief, on July 7, 1992, Defendant Dailey closed or ordered the closure of UST 1 and UST 2 by removing the tanks or ordering the removal of the tanks without implementing a closure plan, which consists of a site investigation required by N.J.A.C. 7:26E-3.3 and a tank decommissioning plan.

41. As owner and operator of UST 1 and UST 2, Defendant failed to implement a closure plan consisting of a site investigation set forth at N.J.A.C. 7:26E-3.3 and a tank decommissioning plan pursuant to N.J.A.C. 7:14B-9.2(b) upon removal of the USTs.

42. Defendant Thomas Dailey's improper removal of the tanks containing petroleum products conferred economic benefits upon Defendant. Upon information and belief, the benefits include but are not limited to, savings realized from avoided capital or noncapital costs necessary to conduct the required site investigation plan upon closure of the tanks, the return earned on the amount of avoided costs, and benefits accruing as a result of a competitive market advantage enjoyed by reason of Defendant's avoidance of proper removal procedures.

43. The UST Act permits the Department to seek penalties and other relief pursuant to the penalty provision of the Water Pollution Control Act ("WPCA"), N.J.S.A. 58:10A-10(c). N.J.S.A. 58:10A-32.

44. The WPCA permits the Commissioner to bring an action in the Superior Court for injunctive relief, N.J.S.A. 58:10A-10c(1); for the reasonable costs of any investigation, inspection, or monitoring survey that led to the establishment of the violation, including the costs of preparing and litigating the case, N.J.S.A. 58:10A-10c(2); for reasonable costs incurred by the State in removing, correcting, or terminating the adverse effects upon water quality resulting from any unauthorized discharge of pollutants for which action under this subsection may have been brought, N.J.S.A. 58:10A-10c(3); for compensatory damages for any loss or destruction of wildlife, fish or aquatic life, or other natural resources, and for any other actual damages caused by an unauthorized discharge, N.J.S.A. 58:10A-10c(4); and for the actual amount of any economic benefits accruing to the violator from any violation, including savings realized from avoided capital or noncapital costs resulting from the violation, the return earned or that may be earned on the amount of avoided costs, any benefits accruing as a result of a competitive market advantage enjoyed by reason of the violation, or any other benefit resulting from the violation, N.J.S.A. 58:10A-10c(5).

**WHEREFORE,** the Department demands judgment in their favor:

- a. Finding Defendant Thomas Dailey to be in violation of the UST Act and its implementing regulations;
- b. Ordering Defendant to immediately retain a LSRP pursuant to N.J.A.C. 7:26C-2.3(a) and N.J.A.C. 7:26C-2.2(a)(2)(ii);
- c. Ordering Defendant Thomas Dailey to conduct a site investigation as required by and in accordance with all applicable laws and regulations, including, but not limited to N.J.A.C. 7:26E-3.3-3.14, as applicable;
- d. Ordering Defendant Thomas Dailey to pay a civil penalty pursuant to N.J.S.A. 58:10A-10e in an amount the Court deems just and proper;
- e. Ordering Defendant Thomas Dailey to compensate the Department for all reasonable costs that have been and will be incurred for any investigation, inspection, or monitoring survey, which led, or will lead, to establishment of the violation, including the costs of preparing and litigating the case;
- f. Awarding the Department their costs and fees in this action;
- g. Awarding the Department any other relief that this Court deems just and proper;

- h. Reserving the right to bring a claim against defendant in the future for natural resource damages arising out of the discharge of hazardous substances at the Site; and
- i. Reserving the right to bring a claim in the future for any economic benefits that have or will accrue to Defendant, including any savings to be realized from avoided capital or noncapital costs, the return to be earned on the amount of avoided costs, any benefits that will accrue as a result of a competitive market advantage Defendant enjoyed, or any other benefit that will accrue as a result of having violated the Act pursuant to N.J.S.A. 58:10A-10c(5).

**COUNT II**

**Defendants Dailey and 330 Angle Sea's Violation of the  
Underground Storage of Hazardous Substances Act for UST 3**

45. The Department repeats each allegation of the preceding paragraphs above as though set forth in their entirety herein.

46. A "[f]acility" means one or more [UST] systems owned by one person on a contiguous piece of property." N.J.A.C. 7:14B-1.6.

47. UST 3, identified during the December 2015 Inspection, constitutes a "facility" pursuant to N.J.A.C. 7:14B-1.6.

48. "'Close' or 'closure' means the permanent elimination from service of any [UST] system by removal or abandonment in place." N.J.A.C. 7:14B-1.6.

49. An "[owner]" means any person who owns a facility, or any person who has a legal or equitable title to a site containing a facility and has exercised control of the facility." N.J.A.C. 7:14B-1.6.

50. An "[operator]" means each person who leases, operates, controls, supervises, or has responsibility for, the daily operation of a facility, and each person who has the authority to operate, control, or supervise the daily operation of a facility."

51. An "[out of service storage tank]" means any [UST] system in which hazardous substances are contained or have been contained, but from which hazardous substances are not or have not been introduced or dispensed. . ." N.J.A.C. 7:14B-1.6.

52. UST 3 was an out-of-service storage tank in 2015.

53. Any UST system that is out of service for more than twelve (12) months must be closed. N.J.A.C. 7:14B-9.1(d).

54. UST 3 was out of service for twelve (12) months as of December 8, 2016, one year from the date of DEP's 2015 Inspection.

55. Dailey was the owner and operator of UST 3 on December 8, 2015.

56. Dailey was the owner and operator of UST 3 on December 8, 2016.

57. 330 Angle Sea is the current owner and operator of UST 3 as of May 18, 2017. UST 3 continues to be out of service and risks injury to the public health and the environment due to the

ongoing presence of gasoline and petroleum products in the tank and the possibility that it has already leaked petroleum products.

58. The owner and operator of a UST shall complete an investigation of a suspected release in accordance with the requirements of N.J.A.C. 7:14B-7.2(a) within seven calendar days of the discovery of the suspected release when there is water in the UST not attributable to condensation or deliveries or by any other method of discovery of a suspected release. N.J.A.C. 7:14B-7.1(a)(4) & (9).

59. If the investigation conducted in accordance with N.J.A.C. 7:14B-7.2(a) is inconclusive in confirming or disproving a suspected release, the owner and operator shall conduct and complete a site investigation designed to confirm or disprove a suspected discharge in accordance with N.J.A.C. 7:26E-3.3 within the schedule established in N.J.A.C. 7:26E-3.14. N.J.A.C. 7:14B-7.2(b).

60. Dailey, as owner and operator, failed to investigate pursuant to N.J.A.C. 7:14B-7.2(a) within seven days of discovery of the suspected release when water was discovered in UST 3.

61. 330 Angle Sea, as owner and operator, failed to investigate pursuant to N.J.A.C. 7:14B-7.2(a) within seven days of discovery of the suspected release.

62. The owner and operator closing the out of service UST system as required by N.J.A.C. 7:14B-9.1(d) shall comply with the

following requirements, which are set forth at N.J.A.C. 7:14B-9.2(a):

A. Ensure that the facility is registered as required by N.J.A.C. 7:14B-2.2 prior to closure of the UST;

B. Notify DEP of the intent to close the UST system at least fourteen (14) calendar days prior to the closure date;

C. Provide a copy of DEP's approval of the notice of intent to close the tanks to the applicable municipal and county health departments and the applicable local authority with the application for a local demolition permit;

D. Comply with the applicable requirements for the New Jersey Uniform Construction Code, N.J.A.C. 5:23; and

E. If any contamination is detected above any applicable remediation standard, conduct the remediation pursuant to the Administrative Requirements for the Remediation of Contaminated Sites, N.J.A.C. 7:26C.

63. The owner and operator closing an UST system must implement a closure plan, which consists of a site investigation set forth at N.J.A.C. 7:26E-3.3 and a tank decommissioning plan. N.J.A.C. 7:14B-9.2(b). An LSRP must be retained.

64. As owner and operator, Dailey failed to properly close the UST system after UST 3 remained out of service for over twelve (12) months as of December 8, 2016. Dailey also failed to implement a closure plan consisting of a site investigation set

forth at N.J.A.C. 7:26E-3.3 and a tank decommissioning plan pursuant to N.J.A.C. 7:14B-9.2(b).

65. As owner and operator, 330 Angle Sea failed to properly close the UST system after UST 3 remained out of service for over twelve (12) months. As owner and operator, 330 Angle Sea failed to implement a closure plan consisting of a site investigation set forth at N.J.A.C. 7:26E-3.3 and a tank decommissioning plan pursuant to N.J.A.C. 7:14B-9.2(b).

66. Dailey's and 330 Angle Sea's failure to remove UST 3 and investigate the suspected discharge from UST 3 conferred economic benefits upon Defendants. Upon information and belief, the benefits include but are not limited to, savings realized from avoided capital or noncapital costs necessary to conduct a site investigation and make a tank decommissioning plan and investigating the suspected discharge from the tank, the return earned on the amount of avoided costs, and benefits accruing as a result of a competitive market advantage enjoyed by reason of Defendant's failure to properly close the tank and investigate and potential discharge onto the Site.

67. The UST Act permits the Department to seek penalties and other relief pursuant to the WPCA's penalty provision, N.J.S.A. 58:10A-10(c). N.J.S.A. 58:10A-32.

68. Pursuant to the WPCA, the Commissioner may bring an action in the Superior Court for injunctive relief, N.J.S.A.

58:10A-10c(1); for the reasonable costs of any investigation, inspection, or monitoring survey that led to the establishment of the violation, including the costs of preparing and litigating the case, N.J.S.A. 58:10A-10c(2); for reasonable costs incurred by the State in removing, correcting, or terminating the adverse effects upon water quality resulting from any unauthorized discharge of pollutants for which action under this subsection may have been brought, N.J.S.A. 58:10A-10c(3); for compensatory damages for any loss or destruction of wildlife, fish or aquatic life, or other natural resources, and for any other actual damages caused by an unauthorized discharge, N.J.S.A. 58:10A-10c(4); and for the actual amount of any economic benefits accruing to the violator from any violation, including savings realized from avoided capital or noncapital costs resulting from the violation, the return earned or that may be earned on the amount of avoided costs, any benefits accruing as a result of a competitive market advantage enjoyed by reason of the violation, or any other benefit resulting from the violation. N.J.S.A. 58:10A-10c(5).

**WHEREFORE**, the Department demands judgment in its favor:

- a. Finding Defendants Thomas Dailey and 330 Angle Sea to be in violation of the UST Act and its implementing regulations;
- b. Ordering Defendants to immediately retain a LSRP pursuant to N.J.A.C. 7:26C-2.3(a) and N.J.A.C. 7:26C-2.2(a)(2)(ii);

- c. Ordering Defendants to conduct a site investigation as required by and in accordance with all applicable laws and regulations, including, but not limited to N.J.A.C. 7:26E-3.3 to 14, as applicable;
- d. Ordering Defendants to properly close UST 3 as required by and in accordance with all applicable laws and regulations;
- e. Ordering Defendants to investigate and remediate hazardous discharges at and migrating from the Site in accordance with all applicable laws and regulations;
- f. Ordering Defendants to pay a civil penalty pursuant to N.J.S.A. 58:10A-10e in an amount the Court deems just and proper;
- g. Ordering Defendants to compensate the Department for all reasonable costs that have been and will be incurred for any investigation, inspection, or monitoring survey, which led, or will lead, to establishment of the violation, including the costs of preparing and litigating the case;
- h. Awarding the Department their costs and fees in this action;
- i. Awarding the Department any other relief that this Court deems just and proper;
- j. Reserving the right to bring a claim against Defendants in the future for natural resource damages arising out of the discharge of hazardous substances at the Site; and

k. Reserving the right to bring a claim in the future for any economic benefits that have or will accrue to Defendant, including any savings to be realized from avoided capital or noncapital costs, the return to be earned on the amount of avoided costs, any benefits that will accrue as a result of a competitive market advantage Defendant enjoyed, or any other benefit that will accrue as a result of having violated the Act pursuant to N.J.S.A. 58:10A-10c(5).

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiffs

  
By: \_\_\_\_\_  
Andrew P. Verdone  
Deputy Attorney General

Dated:05/07/2021

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, the Court is advised that Andrew P. Verdone, Deputy Attorney General, is hereby designated as trial counsel for plaintiffs in this action.

R. 4:5-1(b)(2) CERTIFICATION REGARDING

OTHER PROCEEDINGS AND PARTIES

Undersigned counsel certifies that the matters in controversy in this action are currently not the subject of any other pending action in any court or arbitration proceeding known to the State at this time, nor is any non-party known to the State at this time who should be joined in this action pursuant to R. 4:28, or who is subject to joinder pursuant to R. 4:29-1. If, however, any such matter or non-party later becomes known to Plaintiffs, an amended certification will be filed and served upon all other parties and filed with this court in accordance with R. 4:5-1(b)(2).

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY

By: 

\_\_\_\_\_  
Andrew P. Verdone  
Deputy Attorney General

Dated: 05/07/2021

CERTIFICATION OF COMPLIANCE WITH RULE 1:38-7(c)

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b).

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY

By:   
\_\_\_\_\_  
Andrew P. Verdone  
Deputy Attorney General

Dated:05/07/2021